

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

WILDFIRE PRODUCTIONS, L.P.,)	
)	Case No. <u>2:21-cv-1867</u>
Plaintiff,)	
)	
vs.)	
)	
FENWAY SPORTS GROUP, LLC and)	
FENWAY SPORTS GROUP)	
HOCKEYCO, LLC,)	
)	
Defendants.)	

MOTION FOR LEAVE TO FILE COMPLAINT UNDER SEAL TEMPORARILY

1. Plaintiff seeks leave of court to file an unredacted version of the Complaint and all exhibits thereto under seal temporarily. Plaintiff filed a redacted version of the Complaint and exhibits electronically and provided Defendants with an unredacted copy of all filed materials.

2. Plaintiff does not believe that any portion of the Complaint or the exhibits thereto meet the high standard for filing under seal as established by the Third Circuit in *In re Avandia Mktg., Sales Practices & Prods. Liab. Litig.*, 924 F.3d 662 (3d Cir. 2019). However, Plaintiff understands that the Defendants may have a different position as to whether some portions of the Complaint and/or exhibits meet the Third Circuit's requirements for filing under seal. Accordingly, to afford the Defendants the opportunity to review the Complaint and exhibits, Plaintiff seeks permission to temporarily file the Complaint and exhibits under seal.

3. Plaintiff requests that the Court grant this Motion and order Defendants to identify proposed redactions, if any, and to provide a legal justification for such redactions, within seven (7) days of such order.

Dated: December 27, 2021

Respectfully submitted,

/s/ Daniel J. Stuart

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